



1 attorneys' fees, costs, and litigation expenses as permitted under both the ADA, the Unruh Act  
2 and the Health and Safety Code.

3 2. On or about October 11, 2019, Plaintiff and Defendants entered into the  
4 Agreement resolving all claims in the Action. As part of the Agreement, Defendant agreed to  
5 pay Plaintiff \$10,000.00 (the "Settlement Sum") in nine monthly installments (the "Installment  
6 Payments").

7 3. The Agreement further provides that in the event that Defendants fail to make  
8 any of the Installment Payments to Plaintiff, Defendants have 15 days from Plaintiff's written  
9 notice to Defendants to cure the default by making all remaining payments then due to  
10 Plaintiff. If Defendants' default is not cured within such 15 days, then Plaintiff has the right to  
11 file this Stipulated Judgment in the amount of \$10,000.00 ("Judgment") less any Installment  
12 Payments made by Defendants. Plaintiff shall complete paragraphs 4 and 5 of this Stipulated  
13 Judgment accordingly.

14 4. Defendants have thus far made a total of five payments totaling \$6,000.00. On  
15 April 16, 2020, Defendants defaulted on the Installment Payment obligations. Defendants  
16 further failed to cure the default by May 12, 2020 after receiving proper notice pursuant to the  
17 Agreement on April 27, 2020.

18 5. The Parties thereby stipulate that Judgment be entered in favor of Plaintiff and  
19 against Defendants in the remaining amount of \$4,000.00.

20 6. This stipulated judgment shall not affect Plaintiff's ability to enforce the non-  
21 monetary terms of the Agreement in a separate action.

22 **IT IS SO STIPULATED.**

23  
24 Dated: June 18, 2020

MOORE LAW FIRM, P.C.

25  
26 /s/ Tanya E. Moore

Tanya E. Moore

27 Attorney for Plaintiff,

28 Albert Dytch

STIPULATION FOR ENTRY OF JUDGMENT; JUDGMENT

1 Dated: June 18, 2020

VAUGHAN & ASSOCIATES

2  
3 /s/ Khushpreet R. Mehton

4 Khushpreet R. Mehton

Attorneys for Defendants,

5 Diana Ahmed dba Munch India,

6 Nisa Ahmed dba Munch India,

and Musad S. Alsaidi

7 **ATTESTATION**

8 Concurrence in the filing of this document has been obtained from each of the individual(s)  
9 whose electronic signature is attributed above.

10 /s/ Tanya E. Moore

11 Tanya E. Moore

Attorney for Plaintiff,

12 Albert Dytch

13  
14 **JUDGMENT**

15 Pursuant to the Stipulation of the parties, Judgment is hereby entered in favor of Plaintiff  
16 and against Defendants in the amount of \$4,000.00.

17  
18 Dated: June 18, 2020

19 Mafine M. Chesney  
United States Senior District Judge

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STIPULATION FOR ENTRY OF JUDGMENT; JUDGMENT